

1 STEPHANIE M. HINDS (CABN 154284)
2 Acting United States Attorney

3 HALLIE HOFFMAN (CABN 210020)
4 Chief, Criminal Division

5 FRANK J. RIEBLI (CABN 221152)
6 Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055
8 San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Frank.Riebli@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) Case No. 3:21-cr-00274 CRB
14 Plaintiff,)
15 v.) MOTION TO SEAL DOCUMENTS AND DOCKET
16 IAN BENJAMIN ROGERS, and) AND TO DELAY MERGING THE COMPLAINT
17 JARROD COPELAND) UNTIL SUCH TIME AS THE INDICTMENT IS
Defendants.) UNSEALED
18 _____) **FILE UNDER SEAL**

19
20 The United States, by and through its counsel, Assistant United States Attorney Frank Riebli,
21 moves this Court for an order sealing the government's application for a sealing order, the sealing order,
22 the indictment and arrest warrant, and all attachments in the above-referenced case. Disclosure of the
23 specified documents might jeopardize the government's ability to seize a specific item of evidence and
24 the defendant's arrest. Specifically, the government anticipates seeking an arrest warrant for defendant
25 Jarrod COPELAND, and a warrant to seize a specific item of evidence that law enforcement previously
26 saw at COPELAND's residence, and photographed but did not seize. At the time, law enforcement did
27 not appreciate the item's significance. The government will seek a seizure warrant and will attempt to
28 seize that item when it executes the arrest warrant. If COPELAND learns of the indictment before law

FILED

Jul 07 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 enforcement have a chance to execute the warrants, he may dispose of the evidence.

2 It is for this same reason that the government asks the Court to seal the record of this indictment
3 temporarily and direct the Clerk of the Court to delay merging the complaint into the indictment.
4 COPELAND's co-defendant, Ian ROGERS, has already been arrested on a federal charge and has
5 appeared in that action with counsel. His counsel will be notified of any changes to the docket –
6 including the automatic notification generated with the Clerk of the Court merges the complaint into the
7 indictment – and will have the opportunity (and obligation) to notify ROGERS. This, in turn, will result
8 in notification reaching COPELAND. ROGERS is scheduled to appear before a federal magistrate on
9 July 30, 2021. The government anticipates arresting COPELAND and unsealing the indictment and
10 docket before that appearance. Thus, the government seeks only a temporary sealing – about three
11 weeks – to ensure the safe arrest of COPELAND and possible seizure of an item of evidence.

12 Accordingly, the United States requests that the Court seals these documents, except that the
13 Clerk of Court shall provide copies of the sealed documents to employees of the United States
14 Attorney's Office. The United States further requests that the United States Attorney's Office be
15 permitted to share these documents as necessary to comply with its discovery obligations, and with the
16 Federal Bureau of Investigation.

17 DATED: July 6, 2021

Respectfully submitted,

18 STEPHANIE M. HINDS
19 Acting United States Attorney

20 *Is/ Frank J. Riebli*
21 FRANK J. RIEBLI
22 Assistant United States Attorney